

EXHIBIT C

Patricia Amunategui Deposition Excerpts September 11, 2014

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NML CAPITAL LTD.,)
)
Plaintiff,)
)
vs.) Case No.
) 2:14-cv-492-RFB-VCF
THE REPUBLIC OF ARGENTINA,)
)
Defendant.)
_____)

VIDEOGRAPHED DEPOSITION OF PATRICIA AMUNATEGUI
Taken on Thursday, September 11, 2014
By a Certified Court Reporter
At 8:51 a.m.
Held at Woods Erickson & Whitaker
1349 Galleria Drive
Suite 200
Henderson, Nevada

Reported by: Ellen A. Goldstein, CCR 829

1 documents? Are they on a --

2 A In the past?

3 Q Currently.

4 A Current? Current electronic going on -- how
5 they call the name I explain to you -- platform from
6 Mossack Fonseca, platform. When they open the case, we
7 attach to there. So some document -- with my document, I
8 keep it in my office. Some other document, they are not
9 mine anymore, like the Operating Agreement and that kind
10 of stuff, so I don't keep it.

11 Q Okay. But you said that you --

12 A The document I prepare, I keep it all the time.
13 I do copies.

14 Q So you keep hard copies, right, and you said
15 that you have --

16 A Physical and hard.

17 Q You have some electronic --

18 A Uh-huh.

19 Q -- copies?

20 A Uh-huh.

21 Q Are the electronic copies that you just referred
22 to looking through, are they stored on CD?

23 A Some one they stored on CD. Some one they
24 stored in the computer.

25 Q But is it on the Mossack Fonseca platform or

1 someplace else?

2 A On the Mossack Fonseca platform, most of them,
3 because I told you, when they open the instruction, it's
4 like a platform instruction. So we put everything there,
5 the instruction and everything; and after the company is
6 incorporated and it's gone, no more access to that
7 platform anymore on that particular company for me. I
8 don't know how they call. It's a system. It's a
9 computer, you know.

10 Q So did you search the Mossack Fonseca
11 platform --

12 A I searched my --

13 Q Hold on.

14 Did you search the Mossack Fonseca platform for
15 any documents when you were collecting documents to
16 respond to this subpoena?

17 A I search my access, my access what I have, and
18 my access what I have was also the same I have in my
19 file, physical file.

20 Q Okay. So you searched the documents on the
21 Mossack Fonseca platform that you have access to?

22 A Yes.

23 Q I see. And they were the same --

24 A Same, exactly the same.

25 Q -- as the documents in the file?

1 A Uh-huh.

2 Q Okay. And then there are other documents in the
3 Mossack Fonseca platform that you don't have access to?

4 A I can't have access, yeah.

5 Q I understand.

6 Do you know if the Mossack Fonseca platform is
7 shared with all the Mossack Fonseca affiliates?

8 A I don't know. I don't know. The only thing I
9 know is my access.

10 Q Do you know where the platform is maintained?
11 Is it on the server in Panama or --

12 A No idea.

13 Q No idea?

14 A I don't know.

15 Q Is the platform that you're talking about, is
16 that the same thing as the electronic filing cabinet
17 that's referred to in some -- take that back.

18 Have you ever heard the term "electronic filing
19 cabinet"?

20 A No. My first time. Sorry.

21 Q Now could you please turn to Exhibit 14.

22 A Turn to first page?

23 Q Exhibit 14.

24 A Oh, sorry.

25 Q So on the first page do you see this is an

1 Q And the way you find it is by going to the
2 platform and typing in that number --

3 A Correct.

4 Q -- essentially?

5 A Uh-huh.

6 Q Okay. When you want to access the platform to
7 get information about an LLC, is there a matter number
8 that's assigned to the LLC that you go to or is it -- do
9 you search a different way?

10 A Say it -- please repeat it again.

11 (Through the interpreter) Could you please
12 repeat it again.

13 Q When you want to access the platform to get
14 information about an LLC, do you input a matter number in
15 order to access the information on the LLC or do you find
16 it some other way?

17 A The only way I can find it is by the name of the
18 LLC or by the number they give it to me.

19 Q So you could do either of those two things?

20 A Yeah. If I don't find it, it's because they
21 already -- I don't have access anymore myself.

22 Q I see.

23 A It's only at the time that the case is current.

24 Q But when you do have access, the information is
25 accessible either by the company name or by the matter